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Member of the NJ, NY & PA Bars

December 26, 2024

## **VIA ECOURTS**

Hon. Michael A. Shipp, U.S.D.J. Clarkson S. Fisher Building & U.S. Courthouse 402 East State Street Trenton, NJ 08608

Re: United State of America, et al. v. Alliance HC 11, LLC, et al.

Docket No.: 3:21-cv-06766-MAS-TJB

Dear Judge Shipp:

I am writing the Court in response to the Text Order docket entry of December 16, 2024, which required the e-filing of a case status letter by December 23, 2024. I apologize for the untimely filing of this correspondence.

The Complaint in this matter was signed by John E. Keefe, Jr. of then Wilentz, Goldman & Spitzer P.A. and filed under seal in March 2021. At the time of filing, I was his Associate and was also named on the pleading. Thereafter, I left the law firm in November 2021. Since my departure, I have not been involved in this matter in any capacity, and I did not subsequently contact or represent the Plaintiff. Therefore, I do not have the knowledge or authority to make any further representations to the Court on behalf of the Plaintiff in this matter.

I have advised Mr. Keefe of the Court's Text Order docket entry of December 16, 2024, and requested that he contact the Court to provide a case status letter. I respectfully request that I and my law firm be removed as counsel of record in this matter and on the Pacer docket.

Thank you for your time and attention in this matter. Please do not hesitate to contact my office with any questions or concerns.

> Respectfully Submitted, **KEATING LAW FIRM, LLC**

/s/ Christopher J. Keating Christopher J. Keating, Esq.

John E. Keefe, Jr., Esq. via email: jkeefe@keefe-lawfirm.com cc: David V. Simunovich, Esq., via email: david.simunovich@usdoj.gov